

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

MCALLEN DIVISION

DEC 14 2014

UNITED STATES OF AMERICA

V.

Lorraine De La Cruz

A206 879 926

PRINCIPAL

YOB: 1987

USC

David J. Bradley, Clerk

Case Number:
M-14-2358-M

CRIMINAL COMPLAINT

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December 12, 2014 in Starr County, in the Southern District of Texas defendants(s) did,

(Track Statutory Language of Offense)
knowing or in reckless disregard of the fact that Francisco Mateo-Juan and Tomas Lorenzo-Lorenzo, citizens and nationals of Mexico, along with five (5) other undocumented aliens, for a total of seven (7), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) FELONY
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On December 12, 2014, Border Patrol Agents received information from HIDTA Investigator Natividad Gonzalez regarding an alien stash house located at 130 S. Aguirre St., Apartment 3B, in Rio Grande City, Texas. Officer E. Garcia from the Rio Grande City Police Department assisted Border Patrol in conducting a knock and talk. A woman, later identified as Lorraine DE LA CRUZ, answered the door at the apartment and provided written consent to enter and search the residence.

Continued on the attached sheet and made a part of this complaint:

Yes No



Signature of Complainant

Derek Conrow Senior Patrol Agent

Printed Name of Complainant

McAllen, Texas

City and State



Signature of Judicial Officer

December 14, 2014

Date

Peter E. Ormsby, U. S. Magistrate Judge
Name and Title of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-14-2358-M

RE: Lorraine De La Cruz

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CONTINUATION:

Inside, Border Patrol Agents and Officer E. Garcia found 7 undocumented aliens hiding in a closet and in a bedroom. DE LA CRUZ and the 7 undocumented aliens were transported the Rio Grande City Border Patrol Station for processing.

PRINCIPAL STATEMENT:

Lorraine DE LA CRUZ was read her rights. She stated she was willing to provide a statement without the presence of an attorney.

DE LA CRUZ told agents she left her apartment to have dinner with her mother. When she returned, she held a conversation with a neighbor, and then noticed law enforcement outside of her house. She stated she was unaware there were illegal aliens inside her house. In fact, she believes that her ex-husband, who recently saw her on a date with another man, put the illegal aliens in her house to get back at her.

NOTE: Lorraine DE LA CRUZ was the principal of a 1 on 5 Administrative Smuggling Case on 3/30/2011. She was not prosecuted at that time.

MATERIAL WITNESSES' STATEMENT:

Both material witnesses were read their rights. Both stated they were willing to provide statements without the presence of an attorney.

1- Francisco Mateo-Juan told agents he paid \$2,000 (USD) to be smuggled into the United States. The foot guide who smuggled him across the river, told him and the group to run toward some houses and look for an open door in one of the houses. Mateo stated the group found the house at 4:00 AM. Mateo stated the group was instructed by the smuggler to run towards a row of houses and look for the one with the open door. They entered the house and ran into a room to hide. Mateo told agents when they arrived, the owner of the house was asleep, but when she woke up, she offered the group water and a shower. The owner of the house then cooked tacos for them. The group spent the day with the owner of the house until police arrived and arrested them. Mateo identified DE LA CRUZ in a photo lineup as the owner of the house.

2- Tomas Lorenzo-Lorenzo stated he was charged \$5,000 (USD) to be smuggled into United States. Before crossing the river, two foot guides gave the group instructions on where to go after they were on the US side of the river. The foot guide told the group to look for a chair which would be standing on top of a small table, on a porch. That would be the house they were supposed to enter. They ran towards that house, and saw the table with the chair, and entered. The group told the woman inside the house that the foot guides sent them there, and she did not say anything. According to Lorenzo, the woman in the house never asked them to leave. Lorenzo identified DE LA CRUZ as the woman who was in the house when they arrived.